

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

COHN LIFLAND PEARLMAN
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Our File: 39,574-0

In Re:

MAUREEN A. DEVINE,

Debtor.

Case No. 17-16939 (RG)

Chapter 13

Judge: Rosemary Gambardella

**OPPOSITION TO TRUSTEE'S
CERTIFICATION OF DEFAULT**

JEFFREY W. HERRMANN does hereby certify and say that:

1. I am a member of the firm Cohn Lifland Pearlman Herrmann & Knopf LLP, attorneys for Debtor, Maureen Devine.

2. I make this Certification in opposition to the Trustee's Certification of Default filed on October 16, 2017.

3. Debtor has been working in good faith to sell her property located at 296 Pequest Road, Andover, New Jersey (the "Property").

4. Debtor listed the Property July 5, 2017 with Harford Real estate. Since that date, Debtor has reduced the price of the listing three times (on or around August 16, 2017, September 22,

2017 and October 5, 2017) by a total of \$80,000. Attached as **Exhibit "A"** is the MLS listing showing that the listing price on the property is currently \$299,000 as of October 5, 2017.

5. There is only one lien holder on the Property, U.S. Bank Trust ("U.S. Bank"). U.S. Bank filed a Proof of Claim on August 14, 2017 [claim no. 10] with an amendment on September 21, 2017, indicating a balance due of \$227,754.82. The proof of claim does not list a value for the Property.

6. The Property consists of a three bedroom, two bath contemporary house on almost 10 acres of land.

7. Debtor believes that the value of the property exceeds the amount owed to U.S. Bank and closing costs.

8. For this reason Debtor requests an additional 90 days to sell the property.

9. Once an offer is tendered, it will be presented to the Court for approval on notice to all interested parties.

10. I certify under penalty of perjury that the foregoing is true and correct.

DATED: October 24, 2017

/s/Jeffrey W. Herrmann
JEFFREY W. HERRMANN

EXHIBIT "A"

10/5/2017

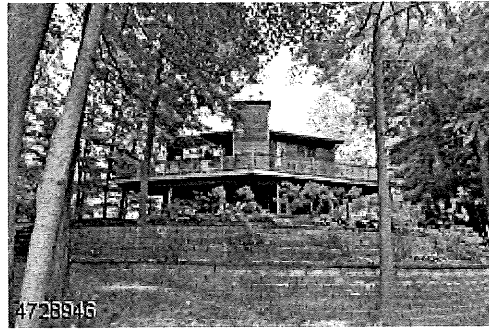
Print GSMLS

Sussex* Green Twp.* (2808)

296 Pequest Rd*

List Price: \$299,900

Residential Client Full Report



MLS#: 3401822
 Status: Active
 Rms: 8
 Bdrm: 3
 FB: 2
 HB: 0
 ZIP: 07821-2116*
 RZIP:
 Block: 24*
 Lot: 5*
 Unit #:
 Floor #:
 Bldg #:
 FHA55+: No
 Pets:

Section:
 ZN:
 GRS: GREEN HLS
 MSJR: GREEN HLS
 HS: NEWTON
 Acres: 9.94*
 LtSz: 9.94 ACS*
 SqFt: 1743
 CLR:
 CL: No
 GSMLS.com: Yes
 YB/Desc/Ren: 2000 / Approximate /
 PSubType: SinglFam
 Style: Contemporary

LP: \$299,900
 OLP: \$379,900
 SP:
 LD: 07/05/2017
 UCD:
 CD:
 ADM: 91
 DOM: 92
 SDA:

Directions: Route 206 to Brighton Road to Pequest Road to # 296

Remarks: A Wildlife Lover's Paradise! This 3 bed, 2 bath contemporary home with cedar siding is truly a home among nature set upon almost 10 acres and encompasses a large part of Turtle Pond. The main living and dining room areas have high ceilings with lots of windows. From the main living area, step out onto the large deck that lines 3 sides of the house. Walkout from the basement onto the large paver patio with stairs to the trail that goes right to Turtle Pond, the wildlife and the boat ramp, where you can launch a paddle boat, row boat or canoe. On the way, stop along the campfire site and watch the sunset. This home has plenty of storage space both inside and out. Use the outdoor wood burning boiler on those chilly nights as a secondary source of heat. Come and see natural beauty at it's best.

INTERIOR

Applncs: Cooktop-Gas, Dishwasher
Bsmnt: Yes / Finished, Walkout
Dine: Living/Dining Combo
Exclu: Refrigerators, Washer/Dryer, Garage Door Openers, Microwave
FirePl: 1 / Gas Fireplace, Living Room
Floor: Carpeting, Tile

Handicap Modified:
IntFeat: High Ceilings, Jetted Tub, Skylight
Kitch: Not Eat-In Kitchen
MastBr:
MstBath:
P-Use:
In-law Suite: No/

EXTERIOR / OTHER FEATURES

Amnt:
Drive: 6 / 2 Car Width, Additional Parking
Exterior: CedarSiding
ExtFeat: Deck, Dock, Outbuilding(s), Patio, Storage Shed

Garage: 2 / Attached Garage
LotDesc: Pond On Lot
Pool: No/
Roof: Asphalt Shingle

ROOM DIMENSIONS

LivRm: / First
Mstr: / Second
Rec Room: /Basement
LevelB: 1 Bedroom, Den, Rec Room, Storage Room, Utility Room
LevelG:
Level1: Bath(s) Other, Dining Room, Kitchen, Laundry Room, Living Room
Level2: 2 Bedrooms, Bath Main
Level3:
OthLev:
Attic:

Kitch: / First
Bed3: / Basement
Den: /Basement
Den: /
Bed4: /
Storage Room: /Basement

FamRm: /

UTILITIES

Heat: Baseboard - Hotwater
Cool: Central Air
Fuel: Gas-PropaneLeased, OilTankAboveGround-Inside, Wood
Service:

Sewer: Septic
Utilities: Gas-Propane
Water: Well
WtrHt:

FINANCIAL INFORMATION / TAX INFORMATION

Taxes: \$10,476 / 2016
Fee: \$ /
Other: \$ /
FeeIncl:

TaxRt: 3.469 / 2016
AppFee: \$
Easement: Unknown /

BldAsmt: \$176,600
FarmAsm: No

LndAsmt: \$125,400
HmWrnty:

TotAsmt: \$302,000
OTP: Fee Simple

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Info. deemed RELIABLE but not GUARANTEED - ALL Room Sizes are Approx.

SHANNON HARFORD